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US ENVIRONMENTAL PROTECTION AGENCY
RCRA CORRECTIVE ACTION INSPECTION

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Facility Name: Chemical Processors, Pier 91
Identification Number: WAD000812917
Mailing Address: 2203 Airport Way South
Suite 400 Park 90/5
Seattle, Washington 98134
Facility Address: Pier 91
2001 West Garfield Street
Seattle, Washington
Date of Inspection: July 13, 1989
Participants: Bill Adams, EPA
Peter Ressler, Chempro
Jim Bailey, Sweet-Edwards
Trudy, Chempro
Report Prepared by: Bill Adams, EPS
EPA RCRA Compliance Section

Purpose:

The purpose of this inspection is to determine the facility's compliance with the July 5, 1988 RCRA order 3013 issued to the facility by EPA. In response to this order Chempro prepared a scope of work for monitoring and sampling at the facility. This scope of work was based in part on findings of a Phase I hydrogeological investigation conducted by Sweet-Edwards/Emcom, Inc. in November and December, 1987 for Chempro. Soil borings and monitoring well locations were also chosen based on information included in Chemical Processors. Solid Waste Management Unit Report, dated July 5, 1988. Data collected under the Phase I investigation indicated the presence of hazardous constituents at level sufficient to warrant the 3013 investigation.

Inspection

On April 24, 1989, Chempro submitted the results from the 3013 hydrogeological investigation. The results from this investigation were reviewed by EPA for compliance with the 3013 order. The contractor report indicated the investigation satisfied the requirements of the order but did not fully characterize the sources and extent of contamination. The report indicated that further sampling and monitoring would be necessary in order to fully characterize the site.

I met with the facility representatives and explained the purpose and scope of the inspection. We then proceeded into the field. The following wells or borings were observed at the facility.



<u>Location</u>	<u>Status</u>
SB-1	Soil boring - complete
CP-105-A	Shallow monitoring well - complete
CP-105-B	Deep monitoring well - complete
TB-1	Test boring-complete
TB-2	Test boring-complete
CP-104A	Monitoring well-complete
CP-104B	Monitoring well-complete
CP-107	Monitoring well-complete
CP-110	Monitoring well-complete
CP-103A	Monitoring well-complete
CP-103B	Monitoring well-complete
TB-5	Test boring-complete
SB-2	Soil boring-complete
CP-106	Monitoring well-complete
TB-7	Test boring-complete
TB-3	Test boring-complete
TB-4	Test boring-complete
TB-6	Test boring-complete
CP-109	Monitoring well

These wells and borings were completed in accordance with the 3013 scope of work. Mr. Ressler indicated that all drill cuttings etc. were still in storage waiting to be profiled and sent directly to CSSI for disposal or sent thru the Chempro Lucille Street facility. The Pier 91 facility currently has approximately 51 drums in storage labeled as non-regulated material. According to Mr. Ressler these drums will be labeled as hazardous waste based on the analytical results. According to Mr. Ressler the first round of samples from the soils did not detect any hazardous constituents, but later groundwater sampling did identify hazardous constituents. Therefore these materials will now be handled as hazardous waste.

Closing

The facility has completed the 3013 investigation according to the 3013 proposal and all wells and borings were installed according to the work plan and evaluation of the results indicates the data is valid.